

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Fayetteville Regional Office
County: Robeson
NC Facility ID: 7800203
Inspector's Name: Jeffrey D. Cole
Date of Last Inspection: 04/16/2015
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Silgan Containers Manufacturing Corporation – Maxton Plant</p> <p>Facility Address: Silgan Containers Manufacturing Corporation – Maxton Plant 2120 NC 71 Highway North, Unit A Maxton, NC 28364</p> <p>SIC: 3411 / Metal Cans NAICS: 332431 / Metal Can Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 7800203.15A Date Received: 06/01/2015 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08693/T06 Existing Permit Issue Date: 06/01/2012 Existing Permit Expiration Date: 02/29/2016</p>
Michael Penland Plant Manager (910) 844-4141 2120 NC 71 Highway North, Unit A Maxton, NC 28364	Michael Penland Plant Manager (910) 844-4141 2120 NC 71 Highway North, Unit A Maxton, NC 28364	D. Huff Environmental Engineer (903) 782-1263 PO Box 40 Paris, TX 75461	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	0.0200	3.59	87.10	3.01	0.3100	3.87	2.47 [Glycol Ethers, Unlisted - Spec]
2013	0.0200	3.69	86.59	3.09	0.0900	3.94	2.52 [Glycol Ethers, Unlisted - Spec]
2012	0.0200	2.98	71.28	2.50	0.0800	3.34	2.17 [Glycol Ethers, Unlisted - Spec]
2011	0.0200	3.69	63.63	3.09	0.1000	6.61	3.57 [Glycol Ethers, Unlisted - Spec]
2010	0.0200	4.04	62.63	3.40	0.1100	3.43	2.26 [Glycol Ethers, Unlisted - Spec]

<p>Review Engineer: David Hughes</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08693/T07 Permit Issue Date: Permit Expiration Date:</p>
---	--

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (08693T06) was issued on **June 1, 2012**, with an expiration date of **February 29, 2016**. The renewal application was received on **June 1, 2015**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied.

Under permit condition 2.2.A.3.e, Silgan was required to conduct testing to establish the capture efficiency (CE) for the permanent enclosure and the destruction efficiency (DE) of its two thermal oxidizers (TO) (ID Nos. CD-001 and CD-011). The testing was completed on **July 28 through 30, 2015** and the test report was received on **August 26, 2015**.

In addition to the renewal there was also a request for a name change. The old Legal Corporate/Owner Name was Silgan Can Company. The new Legal Corporate/Owner Name is Silgan Containers Manufacturing Corporation – Maxton Plant.

All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility manufactures soup cans for Campbell Soup Company. As indicated in the most recent inspection report,¹ the facility has two process lines - an older, 3-piece can manufacturing line and a newer 2-piece can line. Each line has slightly different air emissions.

III. History/Background/Application Chronology

April 16, 2015 Annual compliance inspection completed by Jeffrey Cole of the FRO.

June 1, 2015 Received application for renewal.

June 2, 2015 Sent acknowledgment letter indicating that the permit application was complete.

June 8, 2015 Russell Braswell sent an e-mail to Michael Huff suggesting minor changes to the equipment and insignificant lists from Jeffrey Cole's inspection of facility on April 16, 2015. Mike Huff responded via e-mail that the changes were ok.

June 9, 2015 Russell Braswell sent an e-mail to Michael Huff informing him that Silgan's oxidizers CD-001 and CD-011 are not subject to 15A NCAC 02D .0918 or CAM requirements and they won't be included in the permit.

February 3, 2016 Sent draft of permit and permit review out for review. Comments were received from Fayetteville Regional Office on February 4, 2016 via telephone conversation. Comments from the supervisor were received on February 11, 2016. No comments from the facility.

¹ Jeffrey D. Cole (04/16/2015).

IV. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the modification process.

Pages	Section	Description of Changes
Cover and throughout	--	Updated company name and all dates and permit revision number.
12	2.2.A.3.e	Updated language to indicate that testing was completed by 08/31/2015.
13 & 14	2.2.A.3.h	Updated the capture efficiency and the destruction efficiency for the thermal oxidizers (ID Nos. CD-001 and CD-011) based on testing conducted on July 28 through 30, 2015.
15 & 16	2.2.A.4.d	Updated the capture efficiency and the destruction efficiency for the thermal oxidizers (ID Nos. CD-001 and CD-011) based on testing conducted on July 28 through 30, 2015.
18-28	3.0	Updated the General Conditions to the most recent revision (v4.0 12/17/15).
29	Attachment	Updated the list of acronyms.

No changes to the Title V Equipment Editor (TVEE) are needed under this renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 02D .0516, Sulfur Dioxide from Combustion Sources
- 15A NCAC 02D .0521, Control of Visible Emissions
- 15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds (VOC)
- 15A NCAC 02D .1100, Control of Toxic Air Pollutants, for formaldehyde
- 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 02Q .0317, Avoidance Conditions – The facility has taken avoidance conditions for the following regulations:
 - 15A NCAC 02D .0530, Prevention of Significant Deterioration (PSD), for VOC
 - 15A NCAC 02D .1111, Maximum Achievable Control Technology, for avoidance of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Cans (40 CFR 63 Subpart KKKK).

A regulatory review for these current permit conditions will not be included in this document, as the status with respect to these regulations has not changed.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT

The facility currently operates under a facility-wide MACT avoidance condition limiting hazardous air pollutant emissions (HAPs) to less than 10 tons per year of each individual HAP and less than 25 tons per year of all HAPs combined. Permit Condition 2.2.A.4.d contains equations for calculating HAP emissions from the facility. As specified in this condition, the capture efficiency (CE) for the permanent total enclosures and the destruction efficiency (DE) for the thermal oxidizers (TO) are assumed to be the same for VOC and HAP as discussed below. Therefore, the CE and DE will be updated for the MACT avoidance condition under this permit renewal.

PSD

The facility currently operates under a facility-wide PSD avoidance condition limiting VOC emissions to less than 250 tons per consecutive 12 month period. The permit condition stipulates that VOC emissions from ES-001, ES-016, ES-017, and ES-018 shall be controlled by thermal oxidizers and that these oxidizers shall be tested for before and after control emissions, combustion temperature, and destruction efficiencies once per permit term.

Under Air Permit 08693T06, testing shall be repeated and submitted with each renewal application. The testing was completed on July 28 through 30, 2015 and the test report was received on August 26, 2015. Shannon Vogel of the Stationary Source Compliance Branch of the DAQ reviewed the results of the testing and approved the test results in a memorandum dated February 2, 2016.

Two testing conditions were conducted on TO (CD-001), which controls the sheet coater (ES-001). The first condition (tested on July 28, 2015) used a water-based coating (manufacturing name VALSPAR 5005L) which is the coating that is predominantly used at the Silgan Maxton facility. The second condition (tested on July 29, 2015) used a solvent-based coating (manufacturing name VALSPAR 20S67WE) which is a new coating that Silgan is planning to use at the Silgan Maxton facility. The testing on RTO (CD-011), which controls ES-16, ES-17 and ES-18 was the same as the last test.

The following tables summarize the changes in DE and CE for both TO's that will be made to the permit as a result of the testing. The temperature of the TO's will not be modified.

Sheet Coating Line: July 28 and 29, 2015 Destruction and Capture Efficiency Results

Parameter	Test Results Condition 1	Test Results Condition 2	Current Permit Specifications
ES-001 Capture Efficiency	100%	100%	100%
CD-001 Destruction Efficiency	96.83%	98.14%	99.27%
Oxidizer Temperature	1400°F Set Point	1400°F Set Point	Minimum Temp 1400°F

Draw and Iron Processes: July 29 and 30, 2015 Destruction and Capture Efficiency Results

Parameter	Test Results	Current Permit Specifications
Overall Capture Efficiency	95.30%	96.39%

CD-011 Destruction Efficiency	93.09%	94.15%
Oxidizer Temperature	1500°F Set Point	1500°F

The permit will continue to require that testing for CE and DE from each TO shall be repeated and submitted with the permit renewal application.

112(r)

The facility is not subject to Section 112(r) because it does not store any of the regulated substances in quantities above their thresholds. This permit renewal does not affect this status.

CAM

The facility is not subject to 40 CFR 64, compliance assurance monitoring (CAM), and the status with respect to CAM will not change under this permit renewal.

VII. Facility Wide Air Toxics

The facility is currently subject to 15A NCAC 02D .1100, Control of Toxic Air Pollutants, for formaldehyde. This permit renewal does not affect this status or add any new requirements.

VIII. Facility Emissions Review

There is no change in Title V potential emissions for this permit renewal. Actual emissions **from 2010 to 2014** as reported in the emission inventories are presented in the table above.

As seen in the table, the emissions from the facility are well below the PSD avoidance limit for VOC and MACT avoidance limit for HAPs.

IX. Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspection, conducted on **April 16, 2015 by Jeffrey D. Cole** of the Fayetteville Regional Office (FRO), the facility appeared to be in compliance with all applicable requirements

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. There are no affected States/areas within 50 miles of this facility.

XI. Other Regulatory Considerations

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this application.

XII. Recommendations

The permit modification application for Silgan Containers Manufacturing Corporation – Maxton Plant located in Maxton, Robeson County, NC has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The NC DAQ recommends the issuance of Air Permit No. 08693T07.